

AUSA Litton

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Southern District of Ohio

United States of America)	
v.)	
Hanad Hoosh)	Case No. 2:24-mj-30
)	
)	
)	
)	

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Oct. 4, 2022, thru Dec. 27, 2022 in the county of Franklin and Hamilton in the Southern District of Ohio, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 371	(1) Conspiracy to commit an offense against the United States
18 U.S.C. § 1708	(2) Theft or receipt of stolen mail matter generally

This criminal complaint is based on these facts:

See Affidavit in Support of Complaint, incorporated here by reference.

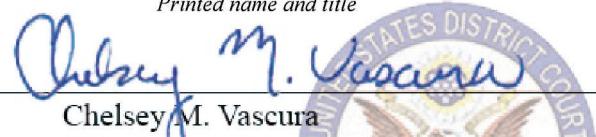
Continued on the attached sheet.



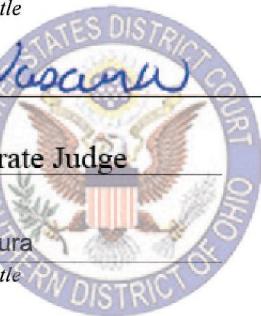
Complainant's signature

Alan J. Wilkins, United States Postal Inspector

Printed name and title


Chelsey M. Vascura
United States Magistrate Judge

Judge's signature



Chelsey M. Vascura
Printed name and title

Sworn to before me and signed in my presence.

Date: 1/19/2024

City and state: Columbus, Ohio

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

The undersigned, Alan J. Wilkins, being first duly sworn deposes and states as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I submit this affidavit in support of a criminal complaint and arrest warrant for HANAD HOOSH for violations of 18 U.S.C. § 371 (Conspiracy to commit an offense against the United States) and § 1708 (Theft or receipt of stolen mail matter generally).
 2. I am a United States Postal Inspector, having been so employed since June 1, 2013. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the United States Postal Inspection Service (USPIS) with investigative responsibility for southwest Ohio and northern Kentucky. I have gained experience through completion of the Basic Inspector Training (BIT) in August of 2013. During BIT training, I was instructed in all phases of criminal investigation, such as criminal law, search and seizure, field enforcement techniques, firearms proficiency, drug and narcotics identification, drug and narcotics field testing, interviewing and evidence collection. Since August 2013, I have worked with various federal,

state, and local law enforcement agencies in the prosecution of crimes involving the U.S. Mail and the U.S. Postal Service, including but not limited to mail fraud, bank fraud, mail theft, burglaries, robberies, homicides, dangerous mail investigations, and mailed narcotics.

3. I am familiar with the facts and circumstances of this case. The information contained in this affidavit is either personally known to me, based upon surveillance, my interview of various witnesses and review of various records/tracking data and publicly available information, or has been relayed to me by other agents or sworn law enforcement personnel. Because this affidavit is provided for the limited purpose of establishing probable cause to support a criminal complaint and arrest warrant, I have not included all details and aspects known by this investigation, but rather, I have set forth only those facts that I believe are necessary to establish probable cause.
4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 371 (Conspiracy to commit an offense against the United States) and § 1708 (Theft or receipt of stolen mail matter generally) have been committed by HANAD HOOSH.

STATEMENT OF PROBABLE CAUSE

5. On or about October 4, 2022, Norwood, Ohio police officers attempted to stop a black Kia K5 for a traffic violation in Hamilton County, Ohio, within the Southern District of Ohio. The Kia unlawfully fled from law enforcement. The vehicle was found a short time later. The officer who initially attempted to stop the vehicle was able to identify two males who were walking on Montgomery

Road, near the location of the recovered vehicle, as the original occupants of the vehicle when it fled. The two suspects were HANAD HOOSH and Michael Hutchins. In addition to the officer identifying HOOSH and Hutchins, Norwood Police found HOOSH's Greendot Bank card in the black Kia K5. HOOSH and Hutchins were interviewed by Norwood Police. Hutchins told police he and HOOSH were in Cincinnati to see a friend of Hoosh named "Momo."

6. On or about October 7, 2022, Norwood police officers executed a search warrant of the black Kia K5 that fled from police on October 4, 2022. Inside the vehicle, law enforcement found checks and other negotiable instruments that were stolen from the U.S. Mail. Also found in the vehicle were bank cards in several different names, a firearm, gloves, duct tape, and a ski mask. Agents also documented a used Priority Mail Express label bearing tracking number EI 104 603 640 US, which was found inside of the vehicle. Postal business records indicated the parcel was sent from Dublin, Ohio (within the Southern District of Ohio), to 300 East 138th Street, Apartment 1G, Bronx, New York 10454.
7. A review of mail theft complaints received by U.S. Postal Inspectors show that, over the past several years, there have been numerous complaints of checks and other negotiable instruments being stolen from the U.S. Mail in the Southern District of Ohio and cashed or uttered in the New York City area.
8. On or about November 17, 2022, Postal Inspectors intercepted a Priority Mail Express Flat Rate Envelope bearing tracking number 9570 1163 2088 2318 4354 62 ("Subject Package 1") from the Mott Haven Post Office, Bronx, New York, located within the Southern District of New York. **Subject Package 1** originally

entered the mail stream in Columbus, Ohio, located within the Southern District of Ohio. **Subject Package 1** was captured by Postal Inspectors in New York and sent back to the Southern District of Ohio for the purposes of execution of a federal search warrant.

Subject Package 1 is further described as follows:

Priority Mail Package, Tracking Number: 9570 1163 2088 2318 4354 62

Weighing approximately 15 ounces in a Priority Mail Express Flat Rate Envelope.

Postage paid was \$27.90.

Sender: JAMES ARONE
1417 SHARON CREEK CT
COLUMBUS OH 43229-1225
(614) 379-3005

Addressee: (614) 655-5555
ALI TUNKARA
300 E 138TH ST
APT 1G
BRONX NY 10454-2904

9. I searched the CLEAR database for the return address of **Subject Package 1**, on Sharon Creek Court, Columbus, Ohio. CLEAR is an investigative platform available to law enforcement and other government investigators that contains public-record data about people and businesses. The information obtained from the CLEAR database indicated that James Arone is not associated with the return address listed above. The information obtained from the database also indicated that telephone number (614) 379-3005 is not associated to James Arone or to the listed return address. The information obtained from the database did show, however, a past association to the return address for an individual named Hoda

Hoosh. Hoda Hoosh shares a current address in the CLEAR database with HANAD HOOSH.

10. I searched the CLEAR database for the listed addressee of **Subject Package 1**. The information obtained from the CLEAR database indicated that Ali Tunkara is associated with the listed address in the Bronx. The information obtained from the database also indicated, however, that phone number (614) 655-5555 is not associated to the listed addressee. A search of U.S. Postal Inspection Service databases showed that Tunkara had been arrested on or about March 1, 2022, by U.S. Postal Inspectors in New York City for accessing USPS relay boxes, attempting to steal U.S. Mail, and unlawful possession of two USPS Arrow Keys, which USPS employees use to access blue collection boxes and other authorized receptacles for the deposit and delivery of mail matter.
 11. On or about November 23, 2022, Postal Inspectors executed a federal search warrant on **Subject Package 1** which had been signed by the Honorable U.S. Magistrate Judge J. Gregory Wehrman. Inside **Subject Package 1**, Inspectors discovered approximately 78 checks suspected of being stolen from the U.S. Mail from the Louisville, Kentucky area.
 12. On or about December 27, 2022, Postal Inspectors identified and intercepted a Priority Mail Express parcel bearing tracking number EI 348 485 394 US (“**Subject Package 2**”). **Subject Package 2** was intercepted by Postal Inspectors in New York City and a search warrant was applied for in the Eastern District of New York.
- Subject Package 2** is further described as follows:

Priority Mail Express Package, Tracking Number: EI 348 485 394 US

Weighing approximately 3 ounces in a Priority Mail Flat Rate Envelope.

Sender: James arone
1417 SHARON CREEK CT
43229

Addressee: Joseph Liam
300 E 138TH ST
APT 1G
BRONX NY 10454

13. Continuing on or about December 27, 2022, Postal Inspectors were able to recover surveillance video taken from the USPS Self Service Kiosk where the postage for **Subject Package 2** was purchased, which was located at the Gahanna Post Office, 246 Lincoln Circle, Suite H, Columbus, Ohio 45230, within the Southern District of Ohio. Inspectors recognized the purchaser of the postage as HANAD HOOSH. Below is an image captured of HOOSH by the Self Service Kiosk during that transaction:



14. On or about January 17, 2023, the Honorable U.S. Magistrate Judge James R. Cho of the Eastern District of New York authorized a federal search warrant for **Subject Package 2**. Inside **Subject Package 2**, Inspectors found approximately 24 checks suspected of being stolen from the U.S. Mail from the Dublin, Ohio and Central Ohio area.
15. On or about March 20, 2023, Mahad Jama was arrested while in possession of a stolen USPS Arrow Key and stolen U.S. Mail in Parma Heights, Ohio. Jama was given his *Miranda* Rights and agreed to speak with law enforcement. Jama also provided law enforcement with consent to search his cellular telephone. In Jama's phone, a contact asked Jama for Hanad's telephone number. Jama responded by providing the phone number (614) 405-6810 (the "**Target Phone**"). A further search of Jama's phone showed a text message conversation that spanned from approximately December 21, 2022, through March 20, 2023, with the **Target Phone**, where the sender of the messages appears to identify themselves as Hanad. The conversation between Jama and the **Target Phone** included many references to the theft of U.S. Mail, the possession of a USPS Arrow Key, fraudulent bank activity, and narcotics. On or about February 11, 2023, the **Target Phone** also sent Jama a picture of a large quantity of checks that appeared to be likely stolen from the U.S. Mail.

CONCLUSION

16. Based on the foregoing facts, your affiant has probable cause to believe that violations of 18 U.S.C. § 371 (Conspiracy to commit an offense against the Untied States) and § 1708 (Theft or receipt of stolen mail matter generally) have been committed by HANAD HOOSH.

Respectfully submitted,



Alan J. Wilkins,
Postal Inspector
United States Postal Inspection Service

Subscribed and sworn to before me on this 19th day of January 2024.



HONORABLE CHELSEY M. VASCURA
UNITED STATES MAGISTRATE JUDGE